

## REMARKS

Claims 1-28 are pending.

Claims 1-28 stand rejected.

### **Claim Rejections - 35 U.S.C. § 102**

Claims 1-28 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,772,395 issued to Hyman (referred to herein as “*Hyman*”). Applicant respectfully traverses the rejection.

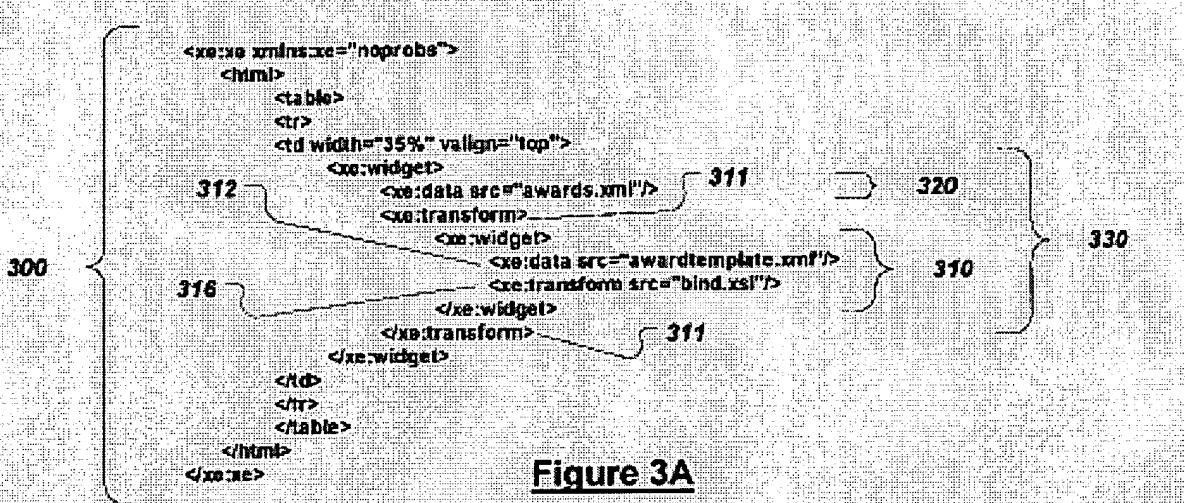
*Hyman* relates to a “self-modifying data flow architecture for computer-readable structures, such as markup language, modeled as a network of interconnected processing elements, each having a data input and a transformation input.” *Hyman*, Abstract. In col. 3, lines 20-32, *Hyman* describes the basic elements of the architecture. Specifically, *Hyman* teaches that:

An exemplary implementation of the architecture according to the invention includes a network of processing elements defined by an XML tree. An XML input tree structure is used to define the data flow relationships between processing elements. Within the input tree, processing elements are defined by appropriate tags, recognized by an execution engine according to another aspect of the invention. Transformation input elements, according to this exemplary implementation, are provided in the form of XSL trees, and data input elements are provided in the form of XML trees. Each processing element therefore generates an output tree, in the form of an XML tree, which is constructed by applying the XSL transformation input to the XML data input. *Id.*, col. 3, lines 20-32.

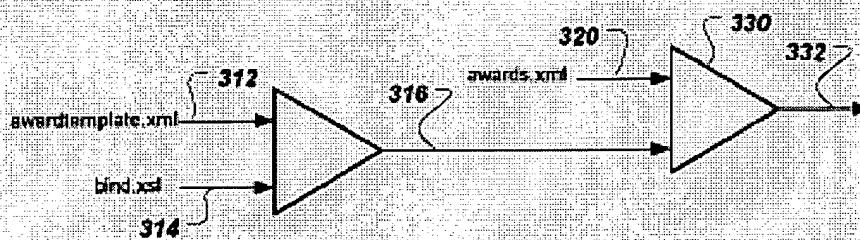
*Hyman* continues by teaching in col. 3, lines 33-35 that the “Nesting of processing elements within the input tree provides for the use of an output tree of one processing element as an input to another processing element.”

Applicant respectfully submits that the Examiner has misinterpreted the teachings of *Hyman* to read on the present invention and, thus, has not established a *prima facie* case of anticipation (nor obviousness).

Applicant has reproduced Figures 3A and 3B of *Hyman* to assist in illustrating distinctions between the teachings and suggestions of *Hyman* and the Present Invention. Applicants believe that the teachings of *Hyman* regarding Figures 3A and 3B illustrate the relevant teachings of *Hyman*.



**Figure 3A**



**Figure 3B**

**In straightforward terms, *Hyman* teaches transforming a first document (312) using a first transformation file (314) into a second transformation file (316). *Hyman*, Figures 3A and 3B, col. 3, line 20 – col. 4, line 14 and col. 8, lines 13-36 (note, Applicant believes that “316” in col. 8, line 27 should be “314”). *Hyman* further teaches that the second transformation file (316) can be used as an input to transform a second document (320) to produce a second output (332) (which is not specifically referenced in the specification). *Id.***

### **Claim 1.**

Applicants initially submit that *Hyman* neither teaches nor suggests “performing a first transformation of said framework to generate **a first set of rules relating to interpretation of said first grammar level.**” Claim 1. *Hyman* does not teach or suggest that any of the outputs (e.g. 316 and 332) pertain to “**a first set of rules relating to interpretation** of said first grammar level”. For example, **the first translated XML file is awardtemplate.xml**. Output 316 is a “transformation input of another processing element 330”. **The second translated XML file is “awards.xml”**. *Hyman* includes no teaching or suggestion that output 316 pertains to a first set of rules relating to interpretation of awardtemplate.xml or another user obtained input with the grammar level of awardtemplate.xml. *Hyman* includes no teaching or suggestion that output 332 pertains to a first set of rules relating to interpretation of awards.xml or another user obtained input with the grammar level of awards.xml. Thus, *Hyman* neither teaches nor suggests Claim 1.

Furthermore, *Hyman* neither teaches nor suggests “**performing a second transformation of said framework** to generate a first presentation style for said first grammar level.” Referring to Figures 3A and 3B of *Hyman*, the first transformation pertains to the transformation of “awardtemplate.xml.”, and the second transformation pertains to the transformation of “awards.xml”. Thus, *Hyman* does not teach or suggest “**performing a second transformation of said framework**”, i.e. performing two transformations on the **same** framework. *Hyman* clearly shows that the second transformation by processing 330 is on a different file, i.e. “awards.xml”, than the first transformed file, i.e. “awardstemplate.xml”. There’s no suggestion in *Hyman* that “awards.xml” and “awardstemplate.xml” are the same framework for the same grammar level, and, thus *Hyman* neither teaches nor suggests “**performing a second transformation of said framework.**” Claim 1.

Additionally, *Hyman* neither teaches nor suggests that the “second transformation” is “to generate a first presentation style for said first grammar level.” Claim 1. The product of the second transformation in *Hyman* is, for example, output 332. *Hyman* neither teaches nor suggests that output 332 is “a first presentation style for said first grammar level” bearing in mind that in Claim 1 the first grammar level is associated with the framework which was first

transformed “to generate a first set of rules relating to interpretation of said first grammar level.”

Claim 1.

Lastly, given the distinctions between *Hyman* and Claim 1 of the first and second transformations, it follows that *Hyman* cannot teach or suggest “applying said first set of rules and said first presentation style to said user defined input to generate an output in a second grammar understood by an application's parser.” Claim 1.

Thus, although *Hyman* teaches the use of nested process elements for multiple transformations. The transformations taught by *Hyman* do not teach or suggest the same type of multiple transformations claimed in the Present Application.

### **Claims 1, 8, and 22.**

In accordance with the foregoing remarks, Applicant respectfully submits that *Hyman* fails to teach or suggest the invention of claims 1, 8, and 22, which recite “performing a first transformation of said framework to generate a first set of rules relating to interpretation of said first grammar level”, “performing a second transformation of said framework to generate a first presentation style for said first grammar level”, and “applying said first set of rules and said first presentation style to said user defined input to generate an output in [“said document, said output conforming to” Claim 8] a second grammar level understood by an application's parser

### **Claim 15.**

Applicants respectfully submit that the present invention of claim 15 is allowable for at least the same reasons as independent claims 1, 8, and 22. In contrast to the teachings and suggestions of *Hyman*, claim 15 recites in relevant part:

    said computer program code configured to cause a computer to:

        perform a **first transformation** of said framework to generate a first set of rules relating to interpretation of said first grammar level;

        perform a **second transformation** of said framework to generate a first presentation style for said first grammar level;

        obtain a user defined input in said first grammar, said user defined input conforming to said first set of rules;

**apply said first set of rules and said first presentation style to said user defined input to generate an output in said document, said output conforming to a second grammar level understood by an application's parser. (emphasis added).**

In light of the above remarks, Applicants respectfully submit that independent claims 1, 8, 15, and 22 are allowable over the teachings and suggestions of *Hyman*.

**Dependent Claims.**

Applicants also respectfully submit that the dependent claims are allowable for at least the same reasons as the independent claim upon which each directly or indirectly depends.

Accordingly, Applicants respectfully request withdrawal of the rejection.

**CONCLUSION**

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop RCE, COMMISSIONER FOR PATENTS, P.O. Box 1450, Alexandria, VA 22313-1450, on December 14, 2005.

  
Attorney for Applicant(s)

12-14-2005  
Date of Signature

Respectfully submitted,



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